North Carolina Department of Environment and Natural Resources
Dexter R. Matthews, Director **Division of Waste Management** Michael F. Easley, Governor
William G. Ross Jr., Secretary

July 10, 2008

Mr. Stacey Smith, P.E.
Richardson Smith Garner & Associates, Inc.
14 N. Boylan Avenue
Raleigh, NC 27603

Re: Application for Thornton Road Mixed Waste Transfer Station
Shotwell Transfer Station, Inc.
Transfer of permit from PCM Construction
Permit No. 92-27T
Wake County, Document ID No. 5141

Dear Mr. Smith:

We have reviewed the document you submitted on June 3, 2008, on the behalf of Shotwell Transfer Station, Inc. Your document addressed comments we made concerning the Thornton Road Mixed Waste Transfer Station application. While many of our comments were addressed satisfactorily, additional information and clarification are needed. The item numbers in the following list refer to our comment in the May 14, 2008, letter.

1. Please state the acreage of the property and the acreage of the facility in the property description.
2. Please add the response to comment in the section of the application which addresses grading over the existing closed LCID.
3. Information requested was provided.
4. The required deeds were added; however, a short paragraph describing the property acquisition and the recombination of the lots should be added to the application for clarity.
5. Information requested was provided.
6. Correction made.
7. Correction made.
8. Correction made.
9. Comment addressed and correction made.
10. The information on the accounting and tracking software (PDOX) only addresses overall tracking of waste entering and leaving the site. It did not explain how operations will

manage the waste onsite to ensure that waste goes to proper landfill based on the service area of the landfill. Please provide that information and include it in the application.

11. The revised site plan did not show where brick and block to be recycled will be stored. Indicate on the site plan the "recycling area" that is mentioned for the storage of inert materials. Please clarify in the drawings or in the text of the report that engineered wood (such as particle board) will not be recycled. Show the storage area for concrete and brick on the site plan drawings, and provide the maximum size of storage. It should be stated that containers in the recycling storage area will be covered at the end of each day and during rain events.
12. Please add sentence to application report.
13. For wood recyclables including pallets, address how the material will be stored and managed such that no contaminated runoff enters groundwater or surface water. Section 2.7.2 should be corrected in that wood pallets and wood debris are not considered inert.
14. Please indicate in the report whether demolition debris will be sorted for recycling. Demolition debris could include materials that contain asbestos or other non-acceptable materials that were not properly sorted at the demolition site for disposal. If demolition debris is to be sorted in the recycling area, an asbestos screening plan is required.

(Responses to Comments 15 and 16 were not in the same order as the letter. Comment numbers below match the number in the letter of May 14, 2008.)

15. A drawing of the building layout was requested, but wasn't provided in the response. Please provide a drawing of the building which includes operation areas that were mentioned in the application, drains and piping to leachate tank, any physical separations between operation areas. Section 2.6.3(5) states that cardboard will be loaded into a compactor and the response states that a cardboard compactor will not be used. Please clarify which is correct and make any appropriate changes to the application.
16. The response indicates that a 100 CY trailer will be used for pallets, but the site plan states 40 CY. Please add this storage information to the text of the report. What is the maximum size of concrete and brick to be stored? Please clarify whether there is temporary recycle storage area in the building. If yes, what is the storage capacity of these areas? Section 2.6.3 indicates that recyclables will be stored in the building for up to 48 hours, and that roll-off containers will be in the transfer floor area. Please provide a sketch of the storage areas in the building and maximum size of each storage.
17. Section 2.7 – What is the "recycling area" that is used to store, separate, and contain commingled recyclables? Please differentiate in the report between the building sorting area and the recycling storage area north of the building.
18. Section 2.7.2 refers to the storage of inert materials. What are the inert "other re-usable new construction materials" that you are expecting to receive?
19. Correction made.
20. Information requested was provided. Please put this information in the application.
21. There wasn't a drawing L1 as indicated in the response. There is a drawing S3 which shows the profile from the leachate tank to the Raleigh sewer tie-in. Comparing 3.3 and

the drawing – (1) There is no detail of the floor drain system on the pad showing that it drains to the leachate tank. Tipping floor is at 224' and floor drain to tank is at 214'. How does it get there? The floor of the transfer station should be sloped to the floor drains, and this shown on a drawing. (2) 3.3.1 says leachate is pumped. Drawing S3 looks like gravity flow. (3) 3.3 states leachate may be pumped to a truck. Where is the connection for this in the facility? (4) How will filters and sludge from the leachate tank be disposed? Include information in application.

22. Please provide a notation in the legend to indicate which graphic refers to which ground cover.
23. Sections 3.4 and 3.5 - MSW transfer stations require daily wash down.
24. Correction made.
25. Add this information to the application as you did for the closed LCID. Who can we contact to ensure that the tires were properly disposed?
26. Please add this information to the application report.
27. Please address this issue in your application. Confirm that the software will calculate and compare the total weight of waste coming in versus the weight going out in both waste and recyclables.
28. Financial assurance is for the event of site abandonment or if the site is found in substantial non-compliance, so a worst case scenario is used for the cost estimate calculation, not the scenario that it would operate under normal conditions. The cost estimate should be equal to the cost to hire a third party to remove and clean up waste from the facility, haul, and dispose of the waste. The amount of waste used in the calculation should be equal to 5 days worth of transfer station volume plus the maximum amount of waste and product that could be stored at the facility at any time, including a full sorting pad. Costs should be calculated with everything, including the recycling area and inert area storage volumes, transported to an MSW landfill. Calculations should show distance to closest MSW landfill, gas and truck volume/trip estimates, current disposal cost of the nearest MSW landfill, site clean-up, and project management fees.
29. Information provided.
30. Comment addressed. This could be a condition in the PTC.

Additional comments

31. Is the site plan provided the final site plan? Have issues on the driveway location been resolved?
32. Please edit document again. Check numbering of sections. (For example, there are two sections 1.2.2.) Ensure that references to sections are correct. (For example, section 1.12.1 references 1.10.2 for PPE. I believe the correct reference 1.12.2).

Please submit responses to comments as replacement pages to the December 2007 report. Replacement pages should list the date the submittal was prepared, the revision number, and page number. The cover sheet should be modified to include revision or final dates, and the

table of contents should be modified, if necessary. Only one paper copy is necessary, but an electronic copy is also needed, either sent by email, or on a CD.

If you have any questions or comments, please contact me at (919) 508-8542, or by email at pat.backus@ncmail.net.

Sincerely,

Pat Backus

Patricia M. Backus, P.E.
Environmental Engineer
Solid Waste Section

cc: David King, Shotwell Transfer Station, Inc.
Jason Watkins, Central Regional Supervisor, DWM
Brad Bailey, Waste Management Specialist, DWM